

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VICTOR FUENTES and CAYLA YOUNG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

ROYAL DUTCH SHELL PLC, SHELL OIL
COMPANY, PENNZOIL-QUAKER STATE
COMPANY and JIFFY LUBE INTERNATIONAL,
INC.,

Defendants.

Civil Action No.: 2:18-cv-05174-AB

**PLAINTIFFS' UNCONTESTED MOTION TO DISMISS WITHOUT PREJUDICE
DEFENDANTS ROYAL DUTCH SHELL, SHELL OIL COMPANY, AND
PENNZOIL-QUAKER STATE COMPANY FROM AMENDED COMPLAINT
PURSUANT TO RULE 41 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Plaintiffs Victor Fuentes and Cayla Young, individually and on behalf of all others similarly situated, request pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure that the Court dismiss without prejudice this action against defendants Royal Dutch Shell, Shell Oil Company, and Pennzoil-Quaker State Company. This request is filed before any of these defendants has pleaded any counterclaim. It is further requested that the caption is conformed to reflect the dismissal of these defendants.

Defendant Jiffy Lube International, Inc., which is the only defendant that has appeared, consents to this dismissal and change in caption.

Dated: May 18, 2020

Respectfully submitted,

/s/ Michael L. Schrag

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CERTIFICATE OF UNCONTESTED MOTION

Pursuant to Local Rule 7.1(b), the undersigned hereby certifies that the foregoing motion to dismiss without prejudice defendants Royal Dutch Shell, Shell Oil Company, and Pennzoil-Quaker State Company pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure is uncontested by defendants Royal Dutch Shell, Shell Oil Company, Pennzoil-Quaker State Company, and Jiffy Lube International, Inc.

/s/ Michael L. Schrag

CERTIFICATE OF SERVICE

I certify that on May 18, 2020, I filed this document on the Court's docket using the Court's CM/ECF system. Based on the Court's records, all counsel of record were served with a copy of the foregoing document by electronic means.

/s/ Michael L. Schrag